

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

B. MILLER,
individually and on behalf of
all those similarly situated,

Plaintiff,

Case No: 18-cv-1152

vs.

CHILDREN'S HOSPITAL OF WISCONSIN, INC.,

Defendant.

**UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Plaintiff and participating class members, by and through their undersigned Counsel, hereby jointly move the Court for a final order approving the settlement of this class action as follows:

1. Finally approving the Settlement Agreement, adjudging its terms to be fair, reasonable, and adequate, and directing consummation of its terms and provisions;
2. Finally approving the enhancement payment of \$3,000 to Named Plaintiff, Brooke Miller;
3. Finally approving the Petition for Class Counsel's Costs and Attorneys' Fees, and awarding Class Counsel costs and attorneys' fees in the total amount of \$177,926.17;

4. Finally approving the settlement amounts to be paid to the participating settlement class members as detailed in Exhibit A to the Declaration of David C. Zoeller, filed herewith;

5. Dismissing the Lawsuit and Plaintiff's Complaint on the merits with prejudice, and barring and permanently enjoining, to the fullest extent of applicable law, Named Plaintiff and all class members (aside from those filing timely and valid requests for exclusion) from pursuing any claims that were released against Defendant, as set forth in Section 8 of the Settlement Agreement.

For the reasons outlined in the memorandum of law filed herewith, Plaintiff believes the Settlement Agreement provides for a fair resolution of the disputes between the parties and respectfully requests that the Court grant final approval of the settlement.

Respectfully submitted this 8th day of November, 2019.

By: /s/David C. Zoeller

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